

## BLMs Corridor Philosophy

And with that brief introduction, we will now begin with our first speaker, Mr. Walt George of the BLM.

Thank you, Robert. The Bureau of Land Management uses a conventional approach to manage linear facilities such as transmission lines on public lands. I call it the agency's Corridor Philosophy. Putting linear facilities in common corridors comes from a basic land use planning principle to put like uses in the same areas rather than disperse them over the landscape. For example, businesses and manufacturing are typically separated from residential areas in city and county plans. Congress directed the BLM to follow this principle in Section 503 of the Federal Land Policy and Management Act, which states: "In order to minimize adverse environmental impacts and proliferation of separate rights of way, the utilization of rights-of-way in common, or corridors as we call them, shall be required to the extent practical."

Congress put flesh on these bones in Section 368 of the 2005 Energy Policy Act when it directed federal agencies to designate corridors on federal lands in the 11 western states for energy pipeline and electrical transmission and distribution facilities.

In early 2009 over 6000 miles of corridors were identified as the federal governments preferred location for linear energy facilities. Interagency operating procedures were established to avoid or minimize environmental harm from

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future projects, and the Federal Energy Regulatory Commission also was given authority to designate national interest energy corridors where interstate transmission was congested.

The BLM designates corridors in its resource management plans. Through consultation during the land use planning process the effects, costs, risks, utility needs and engineering capabilities are considered and evaluated. The BLM manual directs that, whenever possible, the BLM will manage right-of-way use of public land through a system of designated corridors. Use of designated corridors for future right-of-way grants will be actively encouraged by the Bureau of Land Management. A designated corridor is a preferred location for the placement of rights-of-way. During the planning process, BLM also identifies right-of-way exclusion and avoidance areas from its land use plans.

The following slide is an example of these designations in a BLM resource area. You see in the center of the map in a north-south alignment two designated corridors shown in blue and shaded areas. The darker shaded areas represent right-of-way exclusion areas within which linear facilities are not allowed, and the more lightly shaded areas are those avoidance areas. You'll notice that the designated corridors do pass through the shaded right-of-way avoidance areas. This indicates not that the right-of-way avoidance areas do not follow a typical Webster's Dictionary of avoid, in other words not meaning that corridors would not go through there, but symbolize that the BLM management decision by

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designating these areas as avoidance areas is to alert potential public land users that linear facilities placed in these avoidance areas may need to have additional mitigation measures in place for their project above and beyond those that might be required on other federal lands.

There are three things I'd like to emphasize at this point. First of all, by law corridor use is mandated only for what is practical, and of course we all know that practical varies based on an individual's point of view. The use of corridors is the agency's preferred location, but in no way is it mandatory. There are a few exceptions, and I'll discuss those in just a minute. And finally, areas not identified as exclusion or avoidance areas, and this is usually the majority of public lands in a planning area, are typically identified as open to placement of linear facilities on a case-by-case basis.

The benefits of designating and using corridors are that projects in corridors should need limited, on-the-ground environmental studies or alternative route considerations. Environmental effects are confined, not widely dispersed. Third, industry has provided some certainty for infrastructure planning purposes. And finally, permit processing should be streamlined and expedited.

I usually like to think of the three basic types of corridors that are present on public lands. The first are the Energy Policy Act, Section 368 designated corridors, or as they're commonly referred to as West-wide Energy Corridors.

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Second are those other corridors not 368 corridors designated in resource management plans. Again, these are typically identified as the preferred, but not required location for linear facilities. The exception is in some cases, in certain land use plans because of site-specific considerations or local situations, use of a corridor may be mandatory or required. In this case, if a proposed linear facility must be placed outside the designated corridor, then a land use plan amendment would be necessary in order to make the project conform with the land use plan objectives. The final category of corridors on public lands are those that I call de facto corridors. These are routes not designated, but would follow existing linear facilities, and in those cases those facilities or those locations may only have minor environmental issues associated with placing an additional linear facility adjacent to those. These certainly should be routes that would have a high criteria for consideration of future alignments.

As BLM project teams apply this philosophy when developing siting criteria for interstate transmission lines now under consideration. A number of challenging situations arose. First of all, corridors are only designated on public lands. Consequently, the intervening private lands become the likely locations to connect corridors that end and begin on adjacent public land parcels. And of course in some situations the private land owners along those corridors might have a different opinion about where linear facilities should be placed in relationship to their land.

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The second situation was the recognition that the analysis for some of the corridor designations. This is especially true of the West-wide Energy Corridors. This analysis was done at a high level, and some site-specific conflicts were missed or overlooked. For example, in central Wyoming a West-wide Energy Corridor that contained a number of buried natural gas pipelines was designated immediately adjacent to a state historic site. Future buried facilities might be appropriate in this corridor, but it's questionable as to whether an above-ground structure facility such as an electric transmission line would be appropriate adjacent to a state historic site.

The third situation is that designated corridors may not fully meet the applicant's purpose and need. For example, a situation of an old plan where land use needs have changed recently. The best example I can think of this would be the connector lines that come from renewable energy facilities such as wind and solar projects, and connect those to existing substations on the electricity grid. None of the BLM land use plans certainly prepared some time ago would've addressed that need because at the time it wasn't known. The need for renewable energy facilities has only really arisen and come to the forefront of public land use requests in the last couple of years. Another situation in this category might be where the need was simply not known during development of the land use plan. Economies can change rather quickly, and companies change their business plans in response to those changing economies, and in many

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times when the plans are scoped and the needs and issues identified, those future needs are not known at the time.

And finally, utilities use distance or separation as the most straightforward and least expensive way to ensure consistent and reliable delivery of electricity and avoid multiple failures of nearby transmission lines.

To summarize, the BLM uses corridors to provide efficient environmental analysis and application processing, and avoid the environmental effects of widely dispersed alignments. However, because of mixed land ownership and resource differences, corridor designation and use is currently incomplete. In many instances, designated corridors are not wholly sufficient to meet transmission line design and operational needs.

When analyzing proposed transmission lines, the BLM's focus on minimizing environmental effects using corridors is different from that of the Western Electricity Coordinating Council's. WECC is charged with ensuring reliable and uninterrupted operation of the electric grid. Typical in most cost-effective way to avoid multiple failures of transmission lines is to place them apart from each other. The next presentation will give you information on WECC's mission, how they review new projects to ensure system reliability, and how the WECC process intergrades with the BLM NEPA process. The ICF Report presents a framework for BLM staff to evaluate siting proposals when separation to achieve

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reliability puts proposed routes outside of corridors or away from existing transmission lines. The report is essential to evaluate the reasonableness of route separation proposals, and has already been helpful in alternative development on several proposed transmission lines originating in Wyoming.

This concludes my presentation and I thank you all for listening.